

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jolie Bailon

Write the full name of each plaintiff or petitioner.

Case No. 22 CV 06054

-against-

Justin Bieber, Scooter Braun Projects

Wynn Resorts Holdings LLC ^{Wynn Resorts Limited}

NOTICE OF MOTION

Amend Compliant

Write the full name of each defendant or respondent.

Pollen (Street Team Software LLC)
Tripper

PLEASE TAKE NOTICE that

Plaintiff
plaintiff or defendant

Jolie Bailon
name of party who is making the motion

requests that the Court: TO accept additional information
regarding the case.

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☒ a memorandum of law
☒ my own declaration, affirmation, or affidavit
☒ the following additional documents:

Fyre Festival Brief (Research Paper)
Letter regarding Justin Bieber

August 15th 2022

Dated

Jolie Bailon

Name

Jolie Bailon

Signature

Prison Identification # (if incarcerated)

4320 Broadway #1008

Address

New York

City

NH

State

10033

Zip Code

305 322 3139

Telephone Number (if available)

jolies photography@icloud.com

E-mail Address (if available)

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-against-

Justin Bieber, Scooter Braun Projects
Wynn Resorts Holdings LLC
Wynn Resorts Limited, Trippr
Pollen aka Street+team Software Limited

Fill in above the full name of each defendant or respondent.

DECLARATION

To specify certain details, add Research paper
Add a letter to Judge regarding Justin Bieber.

Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, Jolie Bailon, declare under penalty of perjury that the

following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

See Attachments.

Attach additional pages and documents if necessary

August 15th 2022
Executed on (date)

Jolie Baulon
Name

4320 Broadway
Address

305 322 3139
Phone number (if available)

Signature

Prison Identification # (if incarcerated)

NY NY
City State

10033
Zip Code

Joliesphotographycloud.
E-mail Address (if available) com

Jolie Bailon
4320 Broadway #1008
New York NY 10033
305 322 3139

Regarding Justin Bieber

Dear Hon Katherine Polk: (United States District Court SD NY)
40 Foley Square, Rm 2103
NY NY 10007

On August 6 2021, Instagram user @JustinBieber posted the promotional material without an #Ad. This made me think that he truly did plan this event himself and was not endorsed.

Per FTC, Social Media Influencers are obligated to disclose the relationship they have with brands to limit deceptive marketing.

Mr. Bieber's social media team failed to do this.

While it's well known that Mr. Bieber himself does not post promotional material on his social media, his team is his responsibility and the fact that they posted this fraudulent misrepresentation of the ad is deplorable.

As a fan, I relied on the fact that user name @JustinBieber on Instagram and anywhere else on social media is considered to be verified.

Unfortunately Mr. Bieber's team have not been doing a good job in protecting Mr. Bieber to a ray of legal liabilities.

Bieber and his team have been extremely silent regarding this event from the night fans took to twitter to voice their frustration. While tons of angry fans filled his comment sections, asking if he knew that Pollen falsely claimed he would curate the event and make appearances through out the 3 day event, username @JustinBieber posts multiple photos of him relaxing in the tropics after the show. No explanation has been given to the present.

In fact, Bieber has become increasingly silent regarding issues of last minute canceled tour dates, and refunds.

Bieber has only spoke out one time, which was in July, when he had Ramsey Hunts.

Bieber's team waited until the day of, (for multiple shows) to cancel shows they knew Bieber would not be able to do. While some fans actually defend Bieber, many believers lose thousands of dollars for the trip made on behalf of Bieber and his camp. Many were up in the air about the event, because no one who is officially tied to Bieber would give any details.

Using his health to justify canceling shows the day of, even before his Ramsey Hunts scare is absolutely unacceptable, unprofessional and extremely disrespectful to those that love him enough to travel for him.

Mr. Bieber started his career connecting with his fans in a personal level via social media outlets.

Mr. Biebers method of solidifying his fan base included the above method and gaining the trust of fans. At some point in the recent years, Mr. Bieber lconnection with Beliebers have become very financially driven. Bieber rarely posts anything about himself anymore and mostly promotional ads and photos of his significant other are posted on his social media. When there is a show, tour photos are uploaded.

These are almost always endorsements or to promote someone or a brand. A lot of them in which come off as a personal recommendation because there are no disclosures that it's an ad.

For example, in 2019 Biebers Instagram was flooded with photos of NFT "the betweeners" bears as part of his "Personal Recommendation" to invest in.

Fans purchased front row seats and were notified last minute that they were moved to a less valued seat to make way for "betweeners" who have free seats because they invested in NFTs.

Bieber nor his team disclosed this information to fans and many ended up settling for seats not worth the price they paid.

As a way to stop the fan base from bullying him online, Bieber and his team added photos of fans into his tour set. Naive fans fall to the manipulation and just like that the majority is silent.

Overall, I share this to make a point that Bieber and his Team are no longer genuine with fans and are only looking to cash in on them. I do believe that this event was a direct reflection of Biebers changed behavior towards fans in the recent years.

While I may not understand the logistics of how the Bieber Fever Machine works, I know that it's unacceptable to deceive people who support you.

Again Bieber has worked hard to solidify his fan base, so I can't help but wonder why would Bieber or his team repeatedly make choices that Financially hurt Beliebers and never address it.

Personal Opinion

I am disappointed in Mr. Bieber, his management and his team who are supposed to make sure he looks good.

Justin Bieber and Friends was the first time I saw Bieber perform in person. I intended on going to his concert but when this intimate once and a life time event came up, I thought I'd spend a little extra money to be apart of it. Unfortunately, I had a better time at his concert than I did at this intimate gathering full of empty promises.

I like Mr Bieber and want to see him do well. I am not a hater, I don't want to bring him down. I want him to continue to be successful. But not at the cost of Beliebers. Not at the cost of deceiving them.

This is a major reality check for me as I am feeling a form a betrayal. I am not like most fans and would never travel across the country for an hour performance. This came off as something truly exclusive and the fact that Justin's name is all over it makes it worse.

Inflation is ridiculous and we all work hard for our money. Some fans are lucky to have money and so it doesn't bother them. But for the genuine fans that just want to show love in support it hits different when people keep telling you these celebrities don't care about us and then to be proved that. I will always be a fan of his music and art but I myself will not spend another dime on anything regarding Mr. Bieber, not that he needs it anyway.